

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

DORMAN ANGEL, et al.	:	CIVIL ACTION NO. C-1-01-467
	:	
Plaintiffs	:	JUDGE: SANDRA S. BECKWITH
	:	
vs.	:	
	:	<u>PLAINTIFFS' IDENTIFICATION OF WITNESSES</u>
UNITED PAPERWORKERS INTERNATIONAL UNION (PACE) LOCAL 1967, et al.	:	
	:	
Defendants	:	
	:	

Now come Plaintiffs, by and through counsel, and hereby submit their identification of witnesses they intend to call at trial.

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Plaintiffs will testify regarding the allegations contained in their complaint, their knowledge of the collective bargaining agreement, the effects bargaining package, their employment with International Paper and Smart Paper, their termination, and their damages.

2. Tim Bray
PACE Local 1967
1050 Millville Avenue
Hamilton, OH 45013

Mr. Bray will testify as to his knowledge of the negotiation and application of the collective bargaining agreement, the effects benefit package, and the allegations contained in Plaintiffs' complaint.

3. Ken Stanifer
1780 Sunset Avenue
Hamilton, OH 45013

Mr. Stanifer will testify as to his knowledge of the negotiation and application of the collective bargaining agreement, the effects benefit package, and the allegations contained in Plaintiffs' complaint.

4. Gerald Johnston
660 Northland Boulevard, Suite 25
Cincinnati, OH 45240

Mr. Johnston will testify as to his knowledge of the negotiation and application of the collective bargaining agreement, the effects benefit package, and the allegations contained in Plaintiffs' complaint.

5. Mary Rita Weissman
c/o Stanley F. Lechner, Esquire
Morgan, Lewis & Bockius
1111 Pennsylvania Avenue, NW
Washington, DC 20004

Ms. Weissman will testify as to her knowledge as Human Resources consultant for Defendant Smart Paper and the allegations contained in Plaintiffs' complaint.

6. George Payton
Human Resources Manager
c/o Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197

Mr. Payton will testify as to his knowledge as Human Resources Manager for Defendant International Paper and the allegations contained in Plaintiffs' complaint.

7. Milton Lewis
Representative
c/o Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197

Mr. Lewis will testify as to his knowledge as a representative for Defendant International Paper and the allegations contained in Plaintiffs' complaint.

8. Tom Stewart
Labor Relations Specialist
c/o Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197

Mr. Stewart will testify as to his knowledge as Labor Relations Specialist for Defendant International Paper and the allegations contained in Plaintiffs' complaint.

9. Annetta Johnson

Human Resources Manager
c/o Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197

Ms. Johnson will testify as to her knowledge as Human Resources Manager for Defendant International Paper and the allegations contained in Plaintiffs' complaint.

10. Dan Mahew
Manager
c/o Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197

Mr. Mahew will testify as to his knowledge as Manager for Defendant International Paper and the allegations contained in Plaintiffs' complaint.

11. Holcut Philips
Representative
c/o Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197

Mr. Philips will testify as to his knowledge as a representative for Defendant International Paper and the allegations contained in Plaintiffs' complaint.

12. Irvin Sandlin
c/o James B. Robinson, Esquire
Kircher, Robinson & Welch
2520 Kroger Building
1014 Vine Street
Cincinnati, OH 45202

Mr. Sandlin will testify regarding union meetings, his knowledge of the executive board, and the allegations contained in Plaintiffs' complaint.

13. Pat Reese
c/o James B. Robinson, Esquire

Kircher, Robinson & Welch
2520 Kroger Building
1014 Vine Street
Cincinnati, OH 45202

Mr. Reese will testify regarding union meetings, his knowledge of the executive board, and the allegations contained in Plaintiffs' complaint.

14. Pearl Hicks
c/o James B. Robinson, Esquire
Kircher, Robinson & Welch
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Cincinnati, OH 45202

Ms. Hicks will testify regarding union meetings, her knowledge of the executive board, and the allegations contained in Plaintiffs' complaint.

15. Paul Houston
c/o James B. Robinson, Esquire
Kircher, Robinson & Welch
2520 Kroger Building
1014 Vine Street
Cincinnati, OH 45202

Mr. Houston will testify regarding union meetings, his knowledge of the executive board, and the allegations contained in Plaintiffs' complaint.

16. Larry McCreary
c/o Robert I. Doggett, Esquire
6740 Clough Pike, Room 200
Cincinnati, OH 45244

Mr. McCreary will testify as to his attempt to file a grievance relating to the sale and the effects bargaining agreement, the actions taken by the Defendants prohibiting the prosecution of the grievance and other issues related therein.

17. A representative from International Paper who may testify as to the sale of the B Street Mill to Smart Papers and the specifics regarding that transaction. That person will be identified upon further discovery.

18. A representative from Smart Paper who may testify as to the sale of the B Street Mill to Smart Papers and the specifics regarding that transaction. That person will be identified upon further discovery.

19. Plaintiffs reserve the right to call any individual identified by the Defendants.
20. Plaintiffs reserve the right to add any individuals who through the course of discovery within the next month it becomes apparent that their testimony is required for trial.

RESPECTFULLY SUBMITTED,

/s/ Mark J. Byrne

MARK J. BYRNE - #0029243

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CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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I also certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

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